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3/28/2016

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For use by inmates in filing a complaint under CIVIL RIGHTS ACT, 42 USC §1983

INMATE NAME: LOUIS ANTONIO BRYANTPRISONER NO.: 10696-084PLACE OF CONFINEMENT: Federal Correctional Complex, USP II Coleman, FL 33521IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
ROANOKE DIVISIONLOUIS ANTONIO BRYANT  
Enter Full Name Plaintiff

vs.

CIVIL ACTION NO. 7:16-cv-00145Timothy J. Longo, Detective Brian O'Donnell,The Charlottesville Police Department  
Enter Full Name(s) Defendant(s)

A. Have you begun other actions in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment?

✓ Yes        No

B. If your answer to A is Yes, describe the action in the space below.

1. Parties to the Action: UNITED STATES OF AMERICA2. Court: U.S. DISTRICT COURT, CHARLOTTESVILLE3. Docket No.: 3:04-cr-000474. Judge: Norman K. Moon5. Disposition: denied

(For example, is the case still pending? If not, what was the ruling? Was the case appealed?)

C. Have you filed any grievances regarding the facts of your complaint?

Yes        No ✓

1. If your answer is Yes, complete the enclosed verified statement, indicating the result. Please attach evidence of your exhaustion of all available grievance procedures.

2. If your answer is No, indicate the reason for failure to exhaust on the verified statement. You may be required to exhaust your claims through any applicable grievance procedures. Your complaint may be dismissed if you fail to exhaust all avenues of the grievance process in a timely fashion.

There is no grievance process for this claim.

- D. Statement of Claim - State here briefly the facts of your case. Describe what action(s) each defendant took in violation of your constitutional rights. Include also the names of other persons involved, dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of different claims, number and set forth each claim in a separate paragraph. Use as much space as needed. You may attach extra paper if necessary. see paper attached,

Claim #1 - Supporting Facts - Tell your story briefly without citing cases or law.

Detective Brian O'Donnell, Timothy J. Longo, and the Charlottesville Police department have all engaged in racial discrimination and from on or about 1996-2005, racially targeted African Americans <sup>for</sup> crack charges

Claim #2 - Supporting Facts - Tell your story briefly without citing cases or law.

Detective Brian O'Donnell, while acting under the color of state law Purposely withheld the interviews of Roger Lee Henry, David Woodfolk, and Brooks Woodfolk from the Purple Haze undercover drug sting

Claim #3 - Supporting Facts - Tell your story briefly without citing cases or law.

Detective Brian O'Donnell while acting under the color of state law knowingly and intentionally testified falsely in 2004 during a grand jury Proceeding.

- E. State what relief you seek from the Court. Make no legal arguments, cite no cases or statutes.

I seek monetary damages in the amount of 1,500,000.00 for loss of liberty, prison cost, for legal fee's and family visits, Anxiety and

SIGNED THIS 24 DAY OF March, 2016.

Louis Bryant

(Signature of Each Plaintiff)

**VERIFICATION:**

I, Louis Antonio Bryant, state that I am the plaintiff in this action and I know the content of the above complaint; that it is true of my own knowledge, except as to those matters that are stated to be based on information and belief, and as to those matters, I believe them to be true. I further state that I believe the factual assertions are sufficient to support a claim of violation of constitutional rights. Further, I verify that I am aware of the provisions set forth in 28 USC §1915 that prohibit an inmate from filing a civil action or appeal, if the prisoner has, three or more occasions, while incarcerated, brought an action or appeal in federal court that are dismissed on the grounds that it was frivolous, malicious or failed to state a claim upon which relief may be granted, unless the prisoner is in imminent danger of serious physical injury. I understand that if this complaint is dismissed on any of the above grounds, I may be prohibited from filing any future actions without the pre-payment of filing fees.

I declare under penalty of perjury the foregoing to be true and correct.

DATED: 3/24/2016 SIGNED: Louis Bryant

### Claim #1 (continued)

and investigations in the areas where the neighborhood's are predominantly Black people, specifically Hardy drive, 10<sup>th</sup> st NW, Grady AVE, Charlton AVE, Prospect AVE, 5<sup>th</sup> st, 6<sup>th</sup> st, Garret square, and the Reuement area. Records will show that there are more arrest and undercover drug stings for crack cocaine than in any other area in Charlottesville with comparable activity. Statistics will show that there are a significantly more ratio of Blacks charged and arrested in Charlottesville than there are whites for crack cocaine. Most recent statistics support this claim.

### Claim #2 (continued)

of 2000 and in 2006 while acting as a case agent with ATF Agent John Stolz, violated my Due Process by not alerting the courts that he had documents of exculpatory evidence that he withheld during my criminal trial.

### Claim #3 (continue)

the evidence of this claim was made known to me during a Phone call made on July 4, 2015 at 10:52:20 a.m. to David L. Woodfolk, where Woodfolk proffered corroborating evidence that Detective Brian O'Donnell willfully deceived the grand jury and the District Court depriving my Due Process. see attached Proof of Phone call.

### E. (continued)

for the psychological affects from being subjected to more harsh penalties of crack than whites and the hardships of being in prison for being targeted for the discriminatory laws of crack cocaine.

I declare under penalty of perjury the foregoing to be true and correct.

3/24/2016